

January 13, 2003

RE: ITT Aerospace/Communication Tech. Admin. Cnt.  
TO: Interested Parties / Applicant

003-14786-00201

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure



Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

## **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY**

**ITT Aerospace/Communications Technical Administrative Center  
1919 West Cook Road  
Fort Wayne, Indiana 46801**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 003-14786-00201	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 13, 2003  Expiration Date: January 13, 2008

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary space flight communications equipment manufacturing source.

Authorized Individual:	Vice President and Director of Human Resources
Source Address:	1919 West Cook Road, Fort Wayne, Indiana 46801
Mailing Address:	1919 West Cook Road, Fort Wayne, Indiana 46801
General Source Phone Number:	260 - 451 - 6000
SIC Code:	3663, 3812
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) spray paint booth, identified as Emission Unit 1, constructed in 1989, exhausting through Stack 3, equipped with air atomized spray guns and dry filters for overspray control, capacity: 2.50 space flight components per hour.
- (b) One (1) ECD Aqueous cleaners operation, identified as Emission Unit 2, constructed in 1994, exhausting through Stack 2, capacity: 119.1 gallons of cleaner per hour.
- (c) One (1) wave solder operation, identified as Emission Unit 3, constructed in 1988, exhausting through Stack 2, capacity: 907.7 pounds of metal parts per hour.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour consisting of the following.  
  
Two (2) natural gas-fired boilers, constructed in 1986 and 1989, respectively, heat input capacity: 4.37 million British thermal units per hour, each. (326 IAC 6-2-4)
- (b) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;

- (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-2-3)
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (h) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO<sub>2</sub>, and/or NO<sub>x</sub>, three (3) pounds per hour or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:
  - (1) One (1) bearing cleaning operation, identified as Emission Units 4a, 4b, and 4c, consisting of ultrasonic cleaner, beaker boil, and a pressure pot, constructed before 1990, exhausting through Stack 1.
  - (2) One (1) Cobehn spraying operation.
  - (3) One (1) Conformal Coat Prep Area.
  - (4) Electric Ovens.
  - (5) One (1) liquid nitrogen storage tank.
  - (6) One (1) vapor degreaser, constructed after July 1, 1991, capacity: 54 gallons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary or source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual"



as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,  
  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the

following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]**

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.



## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

**C.1** Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2** Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3** Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**C.8 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.10 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.11 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

##### **C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified

mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Significant Activities

- (a) One (1) spray paint booth, identified as Emission Unit 1, constructed in 1989, exhausting through Stack 3, equipped with air atomized spray guns and dry filters for overspray control, capacity: 2.50 space flight components per hour.
- (b) One (1) ECD Aqueous cleaners operation, identified as Emission Unit 2, constructed in 1994, exhausting through Stack 2, capacity: 119.1 gallons of cleaner per hour.
- (c) One (1) wave solder operation, identified as Emission Unit 3, constructed in 1988, exhausting through Stack 2, capacity: 907.7 pounds of metal parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst case single HAP delivered to the coating applicators in the one (1) spray paint booth shall not exceed a total of 9.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in the one (1) spray paint booth area shall not exceed a total of 21.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9] [326 IAC 2-8-4]

- (a) The total volatile organic compound (VOC) delivered to the coating applicators in one (1) spray paint booth shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-2-9 not applicable.
- (b) Any change or modification that increases the potential to emit VOC of the entire source, including all insignificant activities, to greater than one hundred (100) tons per year shall require prior IDEM, OAQ approval.

#### D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP-003-4449-00201, issued on February 15, 1999 and 40 CFR 52 Subpart P, the PM from the one (1) spray paint booth (Emission Unit 1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

or



Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.4 Particulate [326 IAC 6-3-2(d)]**

Pursuant to CP-003-4449-00201, issued on February 15, 1999 and 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) spray paint booth and any control devices.

**Compliance Determination Requirements**

**D.1.6 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the HAPs and VOC usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAPs and VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack 3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.8 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5)

shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the HAPs and VOC emission limits established in Conditions D.1.1 and D.1.2(a).

- (1) The HAPs and VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total HAPs and VOC usage for each month; and
  - (5) The weight of HAPs and VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2(a), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour consisting of the following:
  - Two (2) natural gas-fired boilers, constructed in 1986 and 1989, respectively, heat input capacity: 4.37 million British thermal units per hour, each. (326 IAC 6-2-4)
- (b) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
  - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-2-3)
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (h) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO<sub>2</sub>, and/or NO<sub>x</sub>, three (3) pounds per hour or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:
  - (1) One (1) bearing cleaning operation, identified as Emission Units 4a, 4b, and 4c, consisting of ultrasonic cleaner, beaker boil, and a pressure pot, constructed before 1990, exhausting through Stack 1.
  - (2) One (1) Cobehn spraying operation.
  - (3) One (1) Conformal Coat Prep Area.
  - (4) Electric Ovens.
  - (5) One (1) liquid nitrogen storage tank.
  - (6) One (1) vapor degreaser, constructed after July 1, 1991, capacity: 54 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

#### **D.2.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]**

- (a) Any change or modification that increases the potential to emit of total HAPs from all insignificant activities to greater than 3.85 tons per year shall require prior IDEM, OAQ approval.
- (b) Any change or modification that increases the potential to emit of toluene from all insignificant activities to greater than 0.200 tons per year shall require prior IDEM, OAQ approval.

#### **D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4]**

Any change or modification that increases the potential to emit VOC of the entire source, including all insignificant activities, to greater than one hundred (100) tons per year shall require prior IDEM, OAQ approval.

#### **D.2.3 Particulate Matter Limitation (PM) [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the two (2) insignificant boilers constructed in 1986 and 1989, respectively, rated at 8.74 million British thermal units per hour, total, shall not exceed 0.6 pounds per million British thermal units.

#### **D.2.4 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### **D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]**

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;

- (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

#### **Compliance Determination Requirements**

There are no specific Compliance Determination Requirements applicable to these emission units.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

There are no specific Compliance Monitoring Requirements applicable to these emission units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li><input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201  
Facility: One (1) spray paint booth  
Parameter: Individual HAP delivered to the applicators  
Limit: Shall not exceed a total of 9.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201  
Facility: One (1) spray paint booth  
Parameter: Combination of HAPs delivered to the applicators  
Limit: Shall not exceed a total of 21.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201  
Facility: One (1) spray paint booth  
Parameter: VOC delivered to the applicators  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9      No deviation occurred in this quarter.

9      Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Name:** ITT Aerospace/Communications Technical Administrative Center  
**Source Location:** 1919 West Cook Road, Fort Wayne, Indiana 46801  
**County:** Allen  
**FESOP:** F 003-14786-00201  
**SIC Code:** 3663, 3812  
**Permit Reviewer:** Michael S. Schaffer

On September 3, 2002, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that ITT Aerospace/Communications Technical Administrative Center had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a space flight communications equipment manufacturing source with dry filters for particulate matter overspray control. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

On September 11, 2002, Jeff O'Donnell of ITT Aerospace/Communications submitted comments on the proposed FESOP renewal. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

During our review of the Draft FESOP Renewal Permit for the ITT Aerospace/Communications Technical Administration Center (TAC) located at 1919 West Cook Road, Fort Wayne, Indiana, it was observed that one of our insignificant operations was not specifically identified. ITT Aerospace/Communications (ITT A/CD) agrees and accepts all of the proposed limits contained in the draft FESOP permit (F 003-14786-00201) and does not expect the addition of this insignificant operation to significantly affect the calculated air emissions for the source. To prevent any potential misinterpretations or compliance question ITT A/CD requests that the insignificant operation defined below be specifically addressed in Section D.2 of the final permit.

#### Equipment Background:

The insignificant operation requested to be included in the permit is a vapor phase degreasing unit. The vapor-degreasing unit, which is used for cleaning electronic components, is manufactured by Branson Ultrasonic Corp. (model BSD-BLD-1620). According to manufacturer specifications, total solvent capacity is rated at 54 gallons. Tank dimensions indicate that the working volume of the tank (the volume in the tank available for submerging parts) is about 40 gallons, split between two chambers ("boiling sump": vs. "ultrasonic tank"). The remaining volume is believed to consist of the volume of the recirculation pump and tubing, as well as recessed chambers in the tank that are inaccessible during normal operations.

Parts that are processed through the degreasing unit include individual circuit boards, parent boards, and base-plant heater assemblies. In addition, "parent board assemblies" consisting of multiple pieces of individual electronic units assembled together are degreased daily.

#### Solvent Background:

The solvent used in the degreaser unit is "EnSolv," a proprietary solvent mixture from Enviro Tech International, Inc. ITT A/CD assumes that the EnSolv solvent is 100% volatile organic compounds (VOC) based on the chemical composition information described in the manufacturer's provided Materials Safety Data Sheet (MSDS).

#### Air Emission Calculations:

To calculate the air emissions for the degreaser, two (2) assumptions were used. The two (2) assumptions are - 100% of the solvent content is VOCs and all solvent loss from the degreaser unit will be considered evaporative loss as an air emission.

The air emissions test was conducted by first filling the degreaser unit with solvent to a known and operational volume level. The degreaser unit was then placed into operation cleaning a representative sample of the boards that are cleaned during normal operation at full capacity until a measurable solvent loss could be determined. The test was run for 6 continuous hours providing a solvent loss of 1 lbs. The calculated potential emissions for the degreaser unit are 0.166 pounds per hour or a potential of 0.730 tons per year based on the 8,760 hours per year.

The calculated emission rates for the degreaser unit shows that the operation falls under the permit exempt process section of the regulations by having a potential to emit VOC less than 3 pounds per hour and 15 pounds per day.

#### Response 1:

As a result of the addition of the one (1) insignificant vapor degreaser, the following insignificant activity will be added to Condition A.3 as paragraph (h)(6):

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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(h) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO<sub>2</sub>, and/or NO<sub>x</sub>, three (3) pounds per hour or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:

- (1) One (1) bearing cleaning operation, identified as Emission Units 4a, 4b, and 4c, consisting of ultrasonic cleaner, beaker boil, and a pressure pot, constructed before 1990, exhausting through Stack 1.
- (2) One (1) Cobehn spraying operation.
- (3) One (1) Conformal Coat Prep Area.
- (4) Electric Ovens.
- (5) One (1) liquid nitrogen storage tank.
- (6) One (1) vapor degreaser, constructed after July 1, 1991, capacity: 54 gallons.**

The potential to emit VOC from the entire source as a result of the addition of the one (1) vapor degreaser is still less than one (100) tons per year and the solvent used in the one (1) insignificant

vapor degreaser does not contain toluene or halogenated solvents. Therefore, Conditions D.2.1 through D.2.4 will remain unchanged.

Pursuant to 326 IAC 8-3-1(a)(2), the one (1) insignificant vapor degreaser is subject to the requirements of 326 IAC 8-3-3 and because the degreaser was constructed after January 1, 1980. However, as indicated by ITT in additional information received on November 6, 2002, the one (1) insignificant is not subject to the requirements of 326 IAC 8-3-6 because the one (1) insignificant vapor degreaser has an air solvent interface that is less than one (1) square meter (ten and eight-tenths (10.8) square feet). Therefore, paragraph (h)(6) has been added to the equipment list for Section D.2 and Condition D.2.5 has been added as follows:

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(h) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO<sub>2</sub>, and/or NO<sub>x</sub>, three (3) pounds per hour or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:

- (1) One (1) bearing cleaning operation, identified as Emission Units 4a, 4b, and 4c, consisting of ultrasonic cleaner, beaker boil, and a pressure pot, constructed before 1990, exhausting through Stack 1.
- (2) One (1) Cobehn spraying operation.
- (3) One (1) Conformal Coat Prep Area.
- (4) Electric Ovens.
- (5) One (1) liquid nitrogen storage tank.
- (6) One (1) vapor degreaser, constructed after July 1, 1991, capacity: 54 gallons.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### **D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]**

**Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:**

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;**
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;**
- (c) Minimize solvent carry-out by:**
  - (1) Racking parts to allow complete drainage;**



- (2) **Moving parts in and out of the degreaser at less than eleven (11) feet per minute;**
- (3) **Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;**
- (4) **Tipping out any pools of solvent on the cleaned parts before removal;**
- (5) **Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;**
- (d) **Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;**
- (e) **Not occupy more than half of the degreaser's open top area with the workload;**
- (f) **Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;**
- (g) **Never spray above the vapor level;**
- (h) **Repair solvent leaks immediately, or shut down the degreaser;**
- (i) **Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;**
- (j) **Not use workplace fans near the degreaser opening;**
- (k) **Not allow visually detectable water in the solvent exiting the water separator; and**
- (l) **Provide a permanent, conspicuous label summarizing the operating requirements.**

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

## **Section B**

### **Change 1:**

The general provisions; term of permit rule cite was added to Condition B.3 (Permit Term). In order to avoid confusion for renewals as to what is the "original" date, IDEM, OAQ is referring to, the following change has been made:

#### **B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date of **this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

**Change 2:**

Since Condition B.8(c) (Duty to Supplement and Provide Information) already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity. Also, the condition was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:

**B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**  
**[326 IAC 2-8-5(a)(4)]**

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- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.~~ [326 IAC 2-8-4(5)(E)]
- (c) **For information furnished by the Permittee to IDEM, OAQ,** the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.4. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**Change 3:**

The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from Condition B.15 to Condition B.14. In Condition B.14 (Emergency Provisions), the statement at the end of (b)(4) has been removed, because this is added as (h) as follows:

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (b) (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;
- Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967
- ~~Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~
- (h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

**Change 4:**

Condition B.15(c) (Deviations from Permit Requirements and Conditions), has been deleted and was incorporated as Condition B.14(h) (Emergency Provisions).

**B.15**    Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

~~(c) — Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

**Change 5:**

Condition B.18 (Permit Amendment or Revision) has been revised to replace “should” with “shall” in (b) as follows:

**B.18**    Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(b)    Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

**Change 6:**

Condition B.19(b) has been removed, because this is a Part 70 requirement, but not a FESOP requirement.

**B.19**    Operational Flexibility [326 IAC 2-8-15] **[326 IAC 2-8-11.1]**

~~(b) — The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

~~(1) — A brief description of the change within the source;~~

~~(2) — The date on which the change will occur;~~

~~(3) — Any change in emissions; and~~

~~(4) — Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.~~

~~(e)~~ **(b)** Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

~~(d)~~ **(c)** Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**Change 7:**

Condition B.22 (c) (Transfer of Ownership or Operational Control) has had the rule cite corrected as follows.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-~~44~~ **10**(b)(3)]

**Change 8:**

326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to Condition B.23. Also, the section and phone number of who the Permittee can contact has been corrected in Condition B.23(c) as follows.

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]**

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4320** (ask for OAQ, ~~Technical Support and Modeling Section~~ **I/M & Billing Section**), to determine the appropriate permit fee.

**Section C**

**Change 9:**

Condition C.1 (Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) has been added to the FESOP as follows. All remaining Section C conditions have been renumbered.

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**Change 10:**

Condition C.8(e) (Asbestos Abatement Projects) (now Condition C.9(e)) has been revised to correct the rule cite as follows:

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~41~~, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

**Change 11:**

The following was added to Condition C.10 (Compliance Requirements) (now Condition C.11) to state what IDEM, OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements as follows:

**C.11 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Change 12:**

In Condition C.14(e) (Compliance Response Plan - Preparation, Implementation, Records, and Reports) (now Condition C.15(e)), the rule cite was corrected to reflect the FESOP rules instead of the Title V rules.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of ~~326 IAC 2-7-16~~ **326 IAC 2-8-12** (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**Change 13:**

Condition C.17(d) (General Reporting Requirements) (now Condition C.18(d)) has been revised to indicate all forms as follows:

- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all reports** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The reports do~~ **All reports do** require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Section D.1**

**Change 14:**

Condition D.1.7 was moved to Emission Limitations and Standards and changed to Condition D.1.4 as follows:

Emission Limitations and Standards [326 IAC 2-8-4(1)]

**D.1.74 Particulate [326 IAC 6-3-2(d)]**

Pursuant to CP-003-4449-00201, issued on February 15, 1999 and 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**Change 15:**

Condition D.1.5 (now Condition D.1.6) has been revised as follows:

**D.1.5 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the HAPs **and VOC** usage limitations contained in Conditions D.1.1 **and D.1.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) ~~using formulation data supplied by the coating manufacturer.~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAPs and VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

**Change 16:**

Condition D.1.6 has been deleted since the phrase "with compliance demonstrated at the end of each month" was incorporated into Condition D.1.1 as follows:

~~**D.1.6 Hazardous Air Pollutants (HAPs) Emissions**~~

~~Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for the twelve (12) month period.~~

**Change 17:**

The record keeping requirements language has been revised in Condition D.1.9 (now Condition D.1.8).

~~**D.1.9 8 Record Keeping Requirements**~~

(a) To document compliance with Conditions D.1.1 and D.1.2(a), the Permittee shall maintain records in accordance with (1) through ~~(4)~~ **(5)** below. Records maintained for (1) through ~~(4)~~ **(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the HAPs and VOC emission limits established in Conditions D.1.1 and D.1.2(a).

(1) The ~~amount of~~ HAPs and VOC **content in** ~~of~~ each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

**(2) The amount of coating material and solvent less water used on daily basis.**

**(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

**(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**

~~(2)~~ **(3)** The cleanup solvent usage for each month;

~~(3)~~ **(4)** The total HAPs and VOC usage for each month; and

~~(4)~~ **(5)** The weight of HAPs and VOCs emitted for each compliance period.

**(b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**

~~(b)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Change 18:**

Previously, the terms "particulate" and "particulate matter" were both used in the 326 IAC 6-3, but revisions were made to the rule which became effective on June 12, 2002 that included using the term "particulate" is used consistently in 326 IAC 6-3.

**D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P 326 IAC 6-3-2]**

Pursuant to ~~40 CFR 52 Subpart P~~ **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**, the PM allowable particulate emission rate from the insignificant brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**Change 19:**

The first box on the Emergency Occurrence Report form was revised to include the word "working" in order to be consistent with 326 IAC 2-8-12(b)(5) and the Emergency Provision.

This form consists of 2 pages

Page 1 of 2

**9** This is an emergency as defined in 326 IAC 2-7-1(12)

C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

C The Permittee must submit notice in writing or by facsimile within two (2) **working** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

**Change 20:**

Changes to the quarterly report forms have been made for consistency with Conditions D.1.1 and D.1.2 as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201  
Facility: One (1) spray paint booth  
Parameter: Individual HAP delivered to the applicators  
Limit: ~~Less than~~ **Shall not exceed a total of 9.80 ten (10) tons** per twelve (12) consecutive month period with compliance determined at the end of each month

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201  
Facility: One (1) spray paint booth  
Parameter: Combination of HAPs delivered to the applicators  
Limit: ~~Less than~~ **Shall not exceed a total of 21.1 tons** per twelve (12) consecutive month period with compliance determined at the end of each month

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: ITT Aerospace/Communications Technical Administrative Center  
Source Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
Mailing Address: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP No.: F 003-14786-00201  
Facility: One (1) spray paint booth  
Parameter: VOC delivered to the applicators  
Limit: ~~Less than 21.1~~ **twenty-five (25) tons** per twelve (12) consecutive month period with compliance determined at the end of each month



Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD)  
for a Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>ITT Aerospace/Communications Technical Administrative Center</b>
<b>Source Location:</b>	<b>1919 West Cook Road, Fort Wayne, Indiana 46801</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>3663, 3812</b>
<b>Operation Permit No.:</b>	<b>F 003-14786-00201</b>
<b>Permit Reviewer:</b>	<b>Michael S. Schaffer</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from ITT Aerospace/Communications Technical Administrative Center relating to the operation of a space flight communications equipment manufacturing source. ITT Aerospace/Communication Technical Administrative Center was issued FESOP 003-5093-00201, on October 23, 1997.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) spray paint booth, identified as Emission Unit 1, constructed in 1989, exhausting through Stack 3, equipped with air atomized spray guns and dry filters for overspray control, capacity: 2.50 space flight components per hour.
- (b) One (1) ECD Aqueous cleaners operation, identified as Emission Unit 2, constructed in 1994, exhausting through Stack 2, capacity: 119.1 gallons of cleaner per hour.
- (c) One (1) wave solder operation, identified as Emission Unit 3, constructed in 1988, exhausting through Stack 2, capacity: 907.7 pounds of metal parts per hour.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**New Emission Units and Pollution Control Equipment Receiving New Source Review Approval**

There are no new facilities proposed at this source during this review process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour consisting of the following:

Two (2) natural gas-fired boilers, constructed in 1986 and 1989, respectively, heat input capacity: 4.37 million British thermal units per hour, each. (326 IAC 6-2-4)

- (b) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
  - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3-2)
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (h) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO<sub>2</sub>, and/or NO<sub>x</sub>, three (3) pounds per hour or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:
  - (1) One (1) bearing cleaning operation, identified as Emission Units 4a, 4b, and 4c, consisting of ultrasonic cleaner, beaker boil, and a pressure pot, constructed before 1990, exhausting through Stack 1. (permitted by FESOP 003-5093-00201, issued on October 23, 1997)
  - (2) One (1) Cobehn spraying operation. (permitted by FESOP 003-5093-00201, issued on October 23, 1997)
  - (3) One (1) Conformal Coat Prep Area.
  - (4) Electric Ovens.
  - (5) One (1) liquid nitrogen storage tank.

## History

On October 23, 1997, ITT Aerospace/Communications was issued FESOP 003-5093-0020. On March 22, 1995, a construction permit was filed for the construction of the one (1) spray paint booth,

however, no permit was issued until February 15, 1999. The one (1) spray paint booth, identified as Emission Unit 1, was overlooked and not incorporated in the FESOP. The one (1) spray paint booth was constructed in 1989, therefore, rule applicability will be based on this date.

### Existing Approvals

- (a) FESOP 003-5093-00201, issued on October 23, 1997, and
- (b) CP 003-4449-00201, issued on February 15, 1999

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP 003-5093-00201, issued on October 23, 1997

- (a) Condition D.1.1 - The total quantity of VOCs used at the plant shall be limited to 8.25 tons per month and the total quantity of VOCs used in the paint spray booth shall not exceed 15 pounds per day or 3.0 pounds per hour.

Reason not incorporated: The potential to emit VOC from the entire is now less than one hundred (100) per year, total. In addition, the quantity of VOC used in the paint booth should have been limited to twenty-five (25) tons per twelve consecutive month period with compliance determine at the end of each pursuant to 326 IAC 8-2-1(a)(2) to render the requirements of 326 IAC 8-2-9 not applicable because the spray paint booth was constructed in 1989.

In addition, Condition 4 of CP 003-4449-00201, issued on February 15, 1999 will also not incorporated because the VOC limit in Condition D.1.1(b) is being changed to twenty-five (25) tons per year for the one (1) spray paint booth.

- (b) Condition D.1.2, Hazardous Air Pollutants, which states: The amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month and the amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month, was not incorporated into this FESOP.

Reason not incorporated: Individual HAP emissions shall be limited to ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month and combination of HAPs emissions shall be limited to twenty-five (25) tons per twelve consecutive month period with compliance determined at the end of each month instead of monthly fixed emission limits.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on September 4, 2001. Additional information was received on July 29, 2002 and on August 9, 2002.

### Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

<b>Pollutant</b>	<b>Unrestricted Potential Emissions (tons/year)</b>
PM	79.1
PM <sub>10</sub>	79.3
SO <sub>2</sub>	0.023
VOC*	96.7
CO	3.22
NO <sub>x</sub>	3.83

\* The bearing cleaning operation and the cobehn spraying operation are now insignificant activities due to a significant reduction in the potential to emit VOC at these facilities. Therefore, the potential to emit VOC of the entire source is now less than one hundred (100) tons per year.

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

<b>HAPs</b>	<b>Unrestricted Potential Emissions (tons/year)</b>
Single*	Greater than 10
TOTAL*	Greater than 25

\* For detailed HAP emissions calculations, see pages 2 and 4 of 4 of Appendix A.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards

that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Potential to Emit After Issuance

The source, issued a FESOP on October 23, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F 003-5093-00201; issued on October 23, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating	2.07	2.07	-	less than 25	-	-	Single less than 9.80 total less than 21.1
Cleaner/Washer Operation	-	-	-	4.38	-	-	-
Wave Solder Operation	-	-	-	2.53	-	-	-
Insignificant Activities ( Boilers, Bearing Cleaning, Cobehn Spraying etc.)	10.1	10.3	0.023	3.96	3.22	3.83	*Toluene 0.200 Total 3.85
Total PTE After Issuance	10.2	10.4	0.023	35.9	3.22	3.83	Single less than 10 Total less than 25

The one (1) spray paint booth before limits has a potential to emit greater than twenty-five (25) tons per year. The source has elected to limit the spray paint booth to less than twenty-five (25) tons per year to render the requirements of 326 IAC 8-2-9 not applicable. In addition, the source will limit the potential to emit of a single HAP from the one (1) spray paint booth to less than 9.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month and total HAPs to less than 21.1 tons per year. These limits on the one (1) spray paint booth in combination with the total HAPs from insignificant activities of 3.85 tons per year will render the requirements of 326 IAC 2-7 not applicable.

\* Toluene is the only HAP emitted by insignificant activities that is also emitted by the one (1) spray paint booth. Therefore, any change or modification that increases the insignificant activity's toluene emissions to greater than 0.200 tons per year must receive prior approval from IDEM, OAQ. In addition, any change or modification that increases the total HAPs

from insignificant activities to greater than 3.85 tons per year must also receive prior approval from IDEM, OAQ.

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOCs) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.
- (b) Allen County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Federal Rule Applicability

- (a) The two (2) insignificant boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Dc, because the heat input capacity of each boiler is less than ten (10) million British thermal units per hour.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because the halogenated solvents that are being used at this source are spray cleaners and/or applied by a rag. Pursuant to 40 CFR 63.460, halogenated solvents that are spray cleaners and/or applied by a rag are not covered by NESHAP Subpart T.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The potential to emit of all criteria pollutants for the entire source which is not one (1) of the twenty-eight (28) source categories, is less than two hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit PM, PM<sub>10</sub>, NO<sub>x</sub>, VOC, CO, and SO<sub>2</sub> are less than one hundred (100) tons per year. Therefore 326 IAC 2-6 does not apply.

### 326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The two (2) insignificant boilers, constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the two (2) boilers constructed in 1986 and 1989 is 8.74 million British thermal units per hour, total.

$$Pt = 1.09/(8.74)^{0.26} = 0.62 \text{ lb/MMBtu heat input}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 million British thermal units per hour, Pt shall not exceed 0.6 pounds of PM per million British thermal units.

Based on AP-42 emission factors, the PM emissions from each of the four (4) boilers is as follows:  
 $1.9 \text{ lb PM/mmcf} \times 1 \text{ mmcf}/1,000 \text{ MMBtu} = 0.0019 \text{ lb PM/MMBtu}$

Therefore, the two (2) insignificant boilers, constructed in 1986 and 1989, respectively will comply with this rule.

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

#### 326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to CP-003-4449-00201, issued on February 15, 1999 and 40 CFR 52 Subpart P, the particulate matter (PM) from the one (1) spray paint booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the surface coating, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to 40 CFR 52 Subpart P, the insignificant brazing equipment, cutting torches, soldering equipment and welding equipment shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (c) The potential to emit PM from the insignificant grinding and machining is less than 0.551 pounds per hour. Therefore pursuant to 40 CFR 52 Subpart P, is exempt from the particulate matter limitations of 326 IAC 6-3-2.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

This source under the standard major classification code of #36 coats miscellaneous metal parts. However, for the one (1) spray paint booth, constructed in 1989, the source has elected to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period



with compliance determined at the end of each month. Pursuant 326 IAC 8-2-1(b), this limitation renders the requirements of 326 IAC 8-2-9 not applicable.

### **Testing Requirements**

There are still no testing requirements for this source.

### **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following new compliance requirements were incorporated into this FESOP:

All compliance requirements from previous approvals were incorporated into this FESOP. The source is also subject to the following compliance monitoring requirements:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack 3) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Conclusion**

The operation of this space flight communications equipment manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 003-14786-00201.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

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**Company Name: ITT Aerospace/Communications Technical Administrative Center  
Address City IN Zip: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP: 003-14786  
Plt ID: 003-00201  
Reviewer: Michael S. Schaffer  
Date: August 14, 2001**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Emission Unit 1</b>																
Aeroglaze Z302	7.80	63.70%	0.0%	63.7%	0.0%	30.20%	1.00000	2.500	4.97	4.97	12.42	298.12	54.41	15.50	16.45	50%
Aeroglaze Z306	7.90	78.90%	0.0%	78.9%	0.0%	16.60%	1.00000	2.500	6.23	6.23	15.58	373.99	68.25	9.13	37.55	50%
Aeroglaze A307	7.78	78.10%	0.0%	78.1%	0.0%	16.80%	1.00000	2.500	6.08	6.08	15.19	364.57	66.53	9.33	36.17	50%
Aeroglaze A276	9.60	62.50%	0.0%	62.5%	0.0%	27.10%	1.00000	2.500	6.00	6.00	15.00	360.00	65.70	19.71	22.14	50%
Aeroglaze 9924	7.95	87.10%	0.0%	87.1%	0.0%	13.00%	1.00000	2.500	6.92	6.92	17.31	415.47	75.82	5.61	53.27	50%
Dow Corning NSB-69-82	9.38	73.30%	0.0%	73.3%	0.0%	26.70%	1.00000	2.500	6.88	6.88	17.19	412.53	75.29	13.71	25.75	50%
Strippable Coating	7.51	80.98%	0.0%	81.0%	0.0%	13.25%	1.00000	2.500	6.08	6.08	15.20	364.90	66.59	7.82	45.90	50%
Goddard MSA 94B	9.00	10.00%	10.0%	0.0%	12.0%	90.00%	1.00000	2.500	0.00	0.00	0.00	0.00	0.00	44.35	0.00	50%
Goddard NS43	14.00	10.00%	10.0%	0.0%	12.0%	90.00%	1.00000	2.500	0.00	0.00	0.00	0.00	0.00	68.99	0.00	50%
Goddard MS74	14.00	10.00%	10.0%	0.0%	12.0%	90.00%	1.00000	2.500	0.00	0.00	0.00	0.00	0.00	68.99	0.00	50%
Solihane C113-300	7.74	40.30%	0.0%	40.3%	0.0%	34.70%	1.00000	2.500	3.12	3.12	7.80	187.15	34.16	25.30	8.99	50%
IITRI S13GP/LO-1 TC	9.18	30.30%	0.0%	30.3%	0.0%	62.80%	1.00000	2.500	2.78	2.78	6.95	166.89	30.46	35.03	4.43	50%
Silquest A-1100 Silane	7.13	94.50%	0.0%	94.5%	0.0%	0.30%	1.00000	2.500	6.74	6.74	16.84	404.27	73.78	2.15	2245.95	50%
A-1100 Primer	7.92	78.30%	0.0%	78.3%	0.0%	4.30%	1.00000	2.500	6.20	6.20	15.50	372.08	67.90	9.41	144.22	50%
Aeroglaze 9929	10.04	34.40%	0.0%	34.4%	0.0%	53.40%	1.00000	2.500	3.45	3.45	8.63	207.23	37.82	36.06	6.47	50%

Note: all properties of the materials are "as applied" to the substrate for Paints in Emission Unit 1

PM Control Efficiency 97.00%

**State Potential Emissions**  
METHODOLOGY

**Add worst case coating to all solvents**

**"Worst Case" Uncontrolled**      **17.31**      **415.47**      **75.82**      **68.99**  
**"Worst Case" Controlled**      **17.31**      **415.47**      **75.82**      **2.07**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

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**Company Name:** ITT Aerospace/Communications Technical Administrative Center  
**Address City IN Zip:** 1919 West Cook Road, Fort Wayne, Indiana 46801  
**FESOP:** 003-14786  
**Plt ID:** 003-00201  
**Reviewer:** Michael S. Schaffer  
**Date:** August 14, 2001

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIBK	Weight % MEK	Weight % MDI	Weight % Ethyl Benzene	Weight % Toluene	Weight % Methanol	Xylene Emissions (tons/yr)	MIBK Emissions (tons/yr)	MEK Emissions (tons/yr)	MDI Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Total HAPs (tons/yr)
<b>Emission Unit 1</b>																		
Aeroglaze Z302	7.80	1.00000	2.500	20.00%	20.00%	0.00%	20.00%	0.00%	20.00%	0.00%	17.08	17.08	0.00	17.08	0.00	17.08	0.00	68.33
Aeroglaze Z306	7.90	1.00000	2.500	25.00%	15.00%	0.00%	1.00%	10.00%	15.00%	0.00%	21.63	12.98	0.00	0.87	8.65	12.98	0.00	57.09
Aeroglaze 9924	7.95	1.00000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00	0.00	0.00	1.74	1.74
Dow Corning NSB-69-82	9.38	1.00000	2.500	46.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	47.25	0.00	0.00	0.00	0.00	0.00	0.00	47.25
Strippable Coating	7.51	1.00000	2.500	0.00%	25.00%	20.00%	0.00%	0.00%	50.00%	0.00%	0.00	20.56	16.45	0.00	0.00	41.12	0.00	78.12
IITRI S13GP/LO-1 TC	9.18	1.00000	2.500	20.00%	0.00%	0.00%	0.00%	0.00%	40.00%	0.00%	20.10	0.00	0.00	0.00	0.00	40.21	0.00	60.31
Aeroglaze 9929	10.04	1.00000	2.500	15.00%	15.00%	0.00%	0.00%	3.00%	0.00%	0.00%	16.49	16.49	0.00	0.00	3.30	0.00	0.00	36.28
<b>METHODOLOGY</b>											<b>"Worst Case" Individual HAP</b>	<b>47.2</b>	<b>20.6</b>	<b>16.4</b>	<b>17.1</b>	<b>8.65</b>	<b>41.1</b>	<b>1.74</b>
											<b>"Worst Case" Total HAPs</b>	<b>78.1</b>						

Note: all properties of the materials are "as applied" to the substrate for Paints in Emission Unit 1

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Page 3 of 4 TSD App A**

**Company Name: ITT Aerospace/Communications Technical Administrative Center  
Address City IN Zip: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP: 003-14786  
Plt ID: 003-00201  
Reviewer: Michael S. Schaffer  
Date: August 14, 2001**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

Two (2) insignificant boilers rated @ 4.37 MMBTU/hr, each

8.74

76.56

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.073	0.291	0.0230	3.828	0.211	3.216

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Page 4 of 4 TSD App A**

**Company Name: ITT Aerospace/Communications Technical Administrative Center  
Address City IN Zip: 1919 West Cook Road, Fort Wayne, Indiana 46801  
FESOP: 003-14786  
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Reviewer: Michael S. Schaffer  
Date: August 14, 2001**

Two (2) insignificant boilers rated @ 4.37 MMBTU/hr, each

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.04E-05	4.59E-05	2.87E-03	6.89E-02	1.30E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	1.91E-05	4.21E-05	5.36E-05	1.45E-05	8.04E-05	0.072

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.